UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
JEREMY LEVIN and DR. LUCILLE LEVIN,	
Plaintiff(s),	
-against-	
BANK OF NEW YORK, JP MORGAN CHASE, SOCIETE GENERALE and CITI BANK	
Defendant(s).	
CITIBANK, N.A.,	
Third Party Plaintiff	ANSWER TO THIRD
-against-	PARTY COMPLAINT OF CITIBANK, N.A AGAINST ACCOUNT HOLDERS AND WIRE TRANSFER PARTIES
	Index No.: 09 Civ. 5900
ISLAMIC REPUBLIC OF IRAN, IRANIAN MINISTRY OF INFORMATION AND SECURITY, IRANIAN ISLAMIC REVOLUTIONARY GUARD CORP., JEREMY LEVIN AND DR. LUCILLE LEVIN	
Third Party Defendants	
Third-Party Defendant , by and throug	h its undersigned attorneys,
Placid & Metu, P.C., states as its Answer to and in response to	•
"Complaint") filed by Third Party Plaintiff Citibank, N.A., that	•
asserts no rights to or interest in any assets referenced in the Co	mplaint and respectfully requests that the
Court dismiss with prejudice the Complaint as to	I .
expressly reserves all rights to challenge the p	ersonal jurisdiction of this Court without
assuming the burden of proof of such defenses. Without submit	ting to the personal jurisdiction of this
Court, further responds as follows:	

Nature of the Proceedings

- 1. Denies knowledge or information concerning the allegations set forth in Paragraph 1 of the Complaint, except admits that CITIBANK, N.A. has filed the Complaint as alleged and named as a Third Party Defendant.
- 2. Denies knowledge or information concerning the allegations set forth in Paragraph 2 of the Complaint.
- 3. Denies knowledge or information concerning the allegations set forth in Paragraph 3 of the Complaint.
- 4. Denies knowledge or information concerning the allegations set forth in Paragraph 4 of the Complaint.

Jurisdiction and Venue

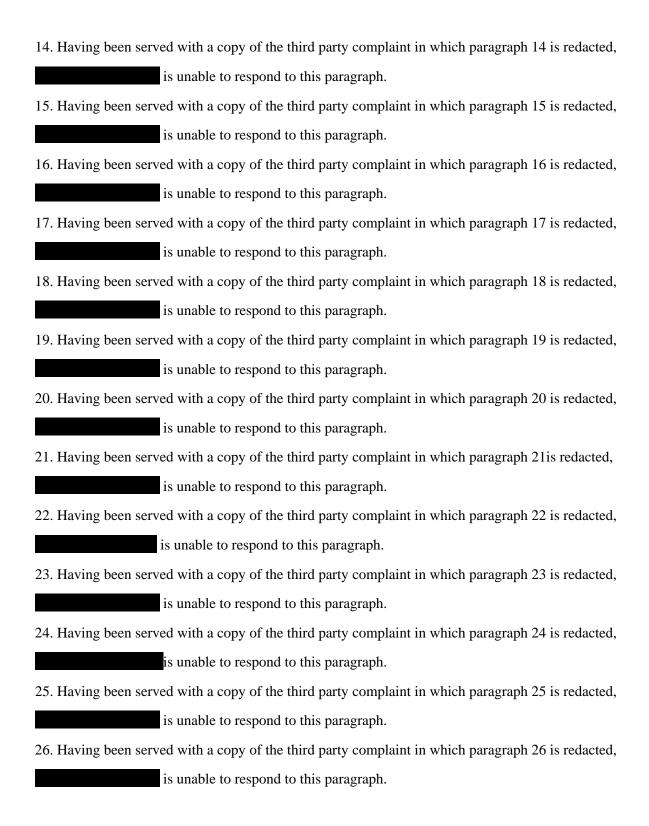
- 5. States that Paragraph 5 of the Complaint states a legal conclusion to which no answer is necessary or appropriate, and otherwise denies knowledge or information concerning the remainder of the allegations set forth therein.
- 6. States that Paragraph 6 of the Complaint states a legal conclusion to which no answer is necessary or appropriate, and otherwise denies knowledge or information concerning the remainder of the allegations set forth therein.

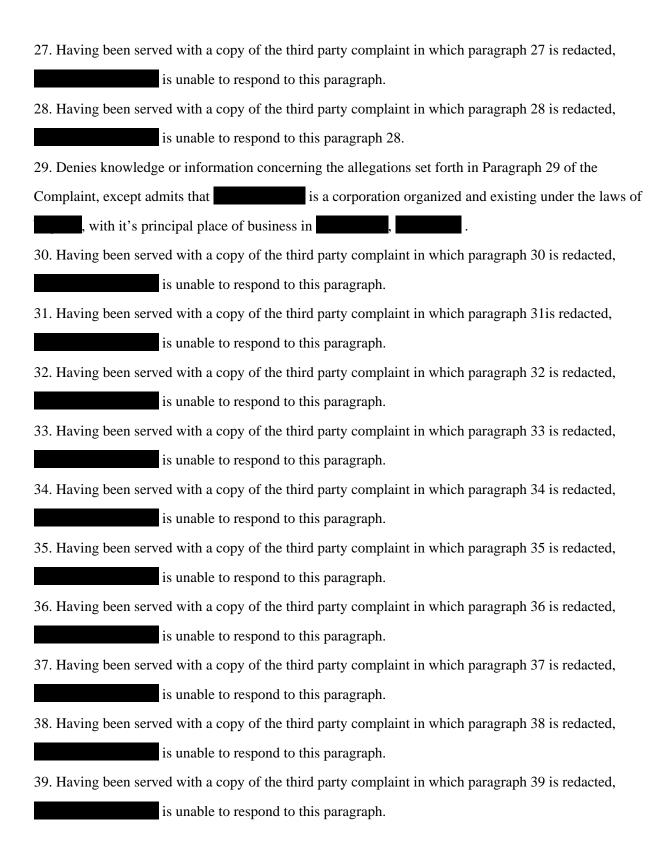
Third-Party Plaintiff

7. Denies knowledge or information concerning the allegations set forth in Paragraph 7 of the Complaint.

Third-Party Defendants

- 8. Denies knowledge or information concerning the allegations set forth in Paragraph 8 of the Complaint.
- 9. Denies knowledge or information concerning the allegations set forth in Paragraph 9 of the Complaint.
- 10. Denies knowledge or information concerning the allegations set forth in Paragraph 10 of the Complaint.
- 11. Having been served with a copy of the third party complaint in which paragraph 11 is redacted, is unable to respond to this paragraph.
- 12. Having been served with a copy of the third party complaint in which paragraph 12 is redacted, is unable to respond to this paragraph.
- 13. Having been served with a copy of the third party complaint in which paragraph 13 is redacted, is unable to respond to this paragraph.





The Turnover Proceeding

- 40. Denies knowledge or information concerning the allegations set forth in Paragraph 40 of the Complaint.
- 41. Denies knowledge or information concerning the allegations set forth in Paragraph 41 of the Complaint.
- 42. Denies knowledge or information concerning the allegations set forth in Paragraph 42 of the Complaint.
- 43. Denies knowledge or information concerning the allegations set forth in Paragraph 43 of the Complaint.
- 44. Denies knowledge or information concerning the allegations set forth in Paragraph 44 of the Complaint.

Phase One of the Turnover Proceeding

- 45. Denies knowledge or information concerning the allegations set forth in Paragraph 45 of the Complaint.
- 46. Denies knowledge or information concerning the allegations set forth in Paragraph 46 of the Complaint.
- 47. Denies knowledge or information concerning the allegations set forth in Paragraph 47 of the Complaint.

Phase Two of the Turnover Proceeding

- 48. Denies knowledge or information concerning the allegations set forth in Paragraph 48 of the Complaint.
- 49. Denies knowledge or information concerning the allegations set forth in Paragraph 49 of the Complaint, but states that makes no claim to and asserts no rights to or interest in any assets referenced in the Complaint.

For The Claims of Citibank in the Nature of Interpleader

First Claim of Relief

50. repeats and realleges each of its responses set forth above as if fully set forth herein.

51. States that Paragraph 51 of the Complaint states a legal conclusion to which no answer is necessary.
To the extent a response is required, admits that the quoted language is contained in CPLR §
5239.
52. States that Paragraph 52 of the Complaint states a legal conclusion to which no answer is necessary of
appropriate.
Second Claim of Relief
repeats and realleges each of its responses set forth above as if fully set forth herein
54. Denies knowledge or information concerning the allegations set forth in Paragraph 54 of the
Complaint, but states that makes no claim to and asserts no rights to or interest in any
assets referenced in the Complaint.
55. Denies knowledge or information concerning the allegations set forth in Paragraph 55 of the
Complaint.
56. States that Paragraph 56 of the Complaint states a legal conclusion to which no answer is necessary of
appropriate.
Third Claim of Relief
57. repeats and realleges each of its responses set forth above as if fully set forth herein.
58. States that Paragraph 58 of the Complaint states a legal conclusion to which no answer is necessary of
appropriate.
The remainder of the Complaint is a prayer for relief to which no response is required.
To the extent an answer is deemed required, the prayer for relief is denied in its entirety. All other
allegations of the Complaint that are not specifically admitted are denied.
reserves the right to amend and/or supplement this Answer.
AFFIRMATIVE DEFENSES
asserts the following affirmative defenses.
defenses without assuming the burden of proof of such defenses or conceding that any parties to the
action have any claims or rights as to further reserves the right to
assert other affirmative defenses as discovery proceeds.
First Defense
The Court has no personal jurisdiction over

WHEREFORE,	
(i) dismissing the third party complaint of Citibank, N.A., as against it, discharging	
. from any and all liability towards Citibank, N.A., with respect to the	
relevant blocked accounts and their proceeds,	
(ii) awarding , its costs and expenses in this proceeding, including reasonable attorneys' fees; and	
(iii) awarding such other and further relief as the Court shall determine to be just and proper.	
Dated: Jamaica, New York January 16, 2012	
Chiiioke Metu, Esa.	

Chijioke Metu, Esq.
PLACID & METU, P.C.
Attornevs for Third Party Defendant(s)

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Our File No. 1577